International Paper	**)**	**Department**
Hancock County	**)**	**Findings of Fact and Order**
Bucksport, Maine	**)**	**Part 70 Air Emission License**
A-22-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	International Paper
LICENSE NUMBER	A-22-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	322121 (pulp mill that produces paper)
NATURE OF BUSINESS	Groundwood and thermomechanical pulp, paper making
FACILITY LOCATION	Main Street, Bucksport
DATE OF LICENSE ISSUANCE	December 30, 2004
LICENSE EXPIRATION DATE	December 30, 2009

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	STACK ID	UNIT CAPACITY	UNIT TYPE
No. 5 Boiler (11-CU-037)	11-ST-037-001	371 MMBtu/hr	Fuel Burning
No. 6 Boiler (11-CU-038)	11-ST-037-001	226 MMBtu/hr	Fuel Burning
No. 7 Boiler (11-CU-039)	11-ST-037-001	226 MMBtu/hr	Fuel Burning
No. 8 Boiler (11-CU-040)	11-ST-040-001	814 MMBtu/hr	Fuel Burning
Combined Cycle Gas Turbine (11-CU-160)	11-ST-160-001	1963 MMBtu/hr gas 2082 MMBtu/hr oil	Fuel Burning
Coal Storage (two silos and three bunkers), Coal Conveying, and Coal Processing (including crushing and screening)	Misc. vents and baghouses	N/A	Process

(11-AS-099; 11-MS-147, 148, 149, 150; 11-PU-100, 101; 11-TK-105, 106, 107, 108, 109, 110)			
No. 1 Paper Machine (12-PU-100)	Misc. vents	N/A	Process
No. 2 Paper Machine (12-PU-200)	Misc. vents	N/A	Process
No. 4 Paper Machine (12-PU-400)	Misc. vents	N/A	Process
No. 5 Paper Machine (12-PU-500)	Misc. Vents	N/A	Process
Off Machine Coater (12-PU-800)	Misc. vents	48 MMBtu/hr	Process
Starch Unloading, Starch Conveying, and Starch Processing (12-TK-046, 045, 051, 053)	Misc. vents and baghouses	N/A	Process
Clay Unloading System (12-TK-034)	12-ST-034-001	N/A	Process
Groundwood Pulping Process (14-PU-100)	Misc. vents	390 ADTP/d (annual ave)	Process
Thermomechanical Pulping Process (15-PU-100)	Misc. vents	300 ADTP/d (annual ave)	Process
Water Treatment Plant (fugitive) (16-PU-100)	Ambient	18 MGD	Process
Roll Grinding Operation (23-PU-001, 002, 003)	23-ST-001-001 23-ST-002-001 23-ST-003-001	N/A	Process
Cold Cleaning Degreasers (23-PU-005)	Ambient Vent	N/A	Process
Gasoline Storage Tank	Ambient	N/A	Process
Onan #1 Emergency Back-Up Diesel Generator (for wastewater treatment pumps)	Stack	6.26 MMBtu/hr	Fuel Burning
Onan #2 Emergency Back-Up Diesel Generator (for wastewater treatment pumps)	Stack	6.26 MMBtu/hr	Fuel Burning
Onan #3 Emergency Back-Up Diesel Generator (for wastewater lift pumps, sludge pumps, clarifier rake drives, sump pumps)	Stack	4.92 MMBtu/hr	Fuel Burning

Note: The nomenclature submitted in the Title V application for identifying areas and equipment is as follows: Mill Area Codes: 01-Woodyard,

11-Power and steam generating area, 12-Paper machine area, 14-Groundwood pulping, 15-Thermomechanical pulping, 16-Wastewater treatment, 17-Printing operations, 22-Water treatment operations, and 23-Miscellaneous. Equipment Codes: CU-Combustion units, PU-Process units, AS-Area sources, TK-tanks/silos, MS-Miscellaneous sources, CD-Control Device, and BD-Building.

Production capacities within the Finding of Fact section of this license are referenced for the purpose of description only. Capacities that are determined to be a license limit are listed as such within the Order section of this license.

International Paper has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

C. Application Classification

The application for International Paper does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. FACILITY AND EMISSION UNIT DESCRIPTION

A. Facility Description

Mill Process
International Paper uses a variety of process operations to manufacture pulp and to make paper. The facility was previously operated by St. Regis Paper Company until 1985/86 when it was bought by Champion International Corporation. A transfer was issued February 12, 2001 to change the ownership from Champion International Corp. to International Paper.

International Paper produces groundwood pulp and thermomechanical pulp (TMP) on site. International Paper also uses other pulp sources including, but not limited to, purchased fiber, coated broke, bleached chemical thermomechanical pulp, and recycle pulp. Different mixtures of these pulps are used to produce light weight coated and uncoated publication paper on the four paper machines.

International Paper has four industrial boilers that produce steam for the facility and two steam turbine electrical generators that produce electricity. A combined cycle gas turbine is also in operation that provides both steam and electricity to the mill. The gas turbine is partially owned by International Paper. International

Paper has the operational and environmental duties associated with the gas turbine.

In addition to the wood processing operation, a steam and power plant, a groundwood pulping operation, a thermomechanical pulping operation, and a paper machine complex with four paper machines, International Paper also has a purchased fiber processing operation, a stock preparation area, a coating preparation area, a finishing, converting, and shipping area, a process water treatment operation, a wastewater collection and treatment operation, and a landfill operation.

Air Quality Classification
International Paper is located in Hancock County, which is designated attainment for all US EPA criteria air pollutants; however Maine is currently part of the Ozone Transport Region (OTR) and thus the entire State of Maine is subject to the non-attainment New Source Review (NSR) requirements for ozone. The northern part of Maine, including Hancock County, has received a waiver from EPA having to meet the nonattainment area NSR requirements for NO_X emissions. A waiver has not been granted for VOC emissions; therefore, International Paper is subject to the nonattainment area NSR requirements for VOC emissions.

NO_X Reasonable Available Control Technology (RACT)
Chapter 138 of the Department's regulations requires that every source that has the potential to emit equal to or greater than 100 tons per year apply NO_X RACT to their applicable NO_X emissions. International Paper was issued air emission license amendment A-22-71-J-A on January 17, 1996 to address NO_X RACT requirements for boilers 6, 7, 8, the off machine coater, and some of the smaller diesel units. The Chapter 138 NO_X RACT requirements are incorporated into this initial Part 70 license. These requirements remain in effect even following receipt of the waiver for NO_X emissions.

VOC RACT
Chapter 134 of the Department's regulations requires facilities that have the potential to emit forty (40) tons or more of VOC per calendar year apply VOC RACT to their applicable VOC emissions. Departmental Order A-22-71-K-A determined that International Paper's VOC sources are meeting the State's VOC RACT requirements. The only VOC RACT license condition is for International Paper to maintain a valid NPDES and/or state permit.

Maximum Available Control Technology (MACT)

The federal Environmental Protection Agency (EPA) promulgates National Emissions Standards for Hazardous Air Pollutants (NESHAPS) for major sources

of HAPs under 40 CFR, Part 63. These NESHAPS are also referred to as MACTs and are promulgated with requirements for specific source categories. NESHAPS are also found in 40 CFR, Part 61 for specific hazardous air pollutants.

40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating standards is applicable to the International Paper facility. The off machine coater is subject to the requirements of Subpart JJJJ. EPA issued a letter to the American Forest and Paper Association dated November 19, 2003 which clarified that 'size presses or size press alternatives (SP/SPA) and on-machine coaters that apply sizing or water-based clay as a component of the papermaking system are not subject to the requirements of 40 CFR Part 63, Subpart JJJJ.

40 CFR Part 63, Subpart S, Pulp and Paper Industry is applicable to International Paper; however, there are no standards listed for the mechanical pulping process, the secondary fiber process, and the papermaking process. The bleaching process section has required controls, but only for chlorine (Cl_2)/chlorine dioxide (ClO_2) bleaching. International Paper does not bleach with chlorine or chlorine dioxide.

40 CFR Part 63, Subpart YYYY, Stationary Combustion Turbines is applicable to International Paper; however, there are no standards for the facility as it is currently operated.

40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines is applicable to International Paper; however, there are no additional requirements for the facility as it is currently operated. International Paper performed a case-by-case MACT determination for the new wastewater treatment back-up generators subject to Subpart ZZZZ, and MACT was determined to be no additional control (see submittal of April 10, 2002 and amendment A-22-71-Y-A, issued August 15, 2002).

40 CFR Part 63, Subpart DDDDD, Industrial/Commercial/Institutional Boilers and Process Heaters, is applicable to International Paper and the facility shall comply with the MACT per the compliance timeframes set forth in the rule.

B. Boiler 5, oil boiler

Unit Description
Boiler 5 is a Riley Stoker boiler with a maximum design heat input capacity of 371 MMBtu/hr firing fuel oil and waste oil. Waste oil is put into the oil header and is burned in whichever boiler is firing oil. Waste oil fired in the boilers at International Paper shall meet the definitions of specification and off-specification waste oil as found in Chapter 860 of the Department's regulations 'Waste Oil Management Rules'.

The boiler was installed in 1966, prior to the New Source Performance Standards (NSPS) Subpart D applicability date. Emissions exit through a 269 ft stack that serves boilers 5, 6, and 7.

Boiler 5 is subject to Chapter 138, NO_X Reasonably Available Control Technology and was part of the facility's NO_X RACT submittal. Boiler 5 is located at a major source of HAPs and is subject to the initial notification in 40 CFR Part 63, Subpart DDDDD.

Control Equipment
Control equipment for boiler 5 consists of low NO_X burners.

Streamlining
1. Opacity
   Chapter 101, Sections (2)(B)(1)(a)(i) and (2)(B)(5)(i) of the Department's regulations contain the applicable opacity standards for boiler 5. No streamlining is required for opacity.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(A)(1) contains an applicable PM lb/MMBtu emission standard (0.2 lb/MMBtu).
   b. BPT establishes an applicable PM lb/MMBtu emission standard (0.075 lb/MMBtu).
   c. BPT establishes the applicable lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the PM lb/MMBtu emission limit for boiler 5, therefore only the more stringent BPT lb/MMBtu limit is included in this license.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. BPT establishes an applicable fuel sulfur content standard (0.7%).
   c. BPT establishes the applicable SO_2 lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the fuel sulfur content standard for boiler 5, therefore only the more stringent BPT fuel sulfur content is included in this license.

5. Nitrogen Oxides (NO_X)
   a. Boiler 5 is equipped with a low NO_X burner for control of NO_X emissions. The low NO_X burner meets the requirement of Chapter 138, Section (3)(B)(1) of the Department's regulations to operate a low NO_X burner or equivalent strategy. Therefore, the lb/MMBtu standard in Chapter 138 does not apply to this boiler.
   b. BPT establishes the applicable NO_X lb/MMBtu and lb/hr emission limits. No streamlining is required for the lb/MMBtu or the lb/hr limits.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit. No streamlining is required for the lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit. No streamlining is required for the lb/hr limit.

Periodic Monitoring
Periodic monitoring for boiler 5 shall consist of maintaining fuel use records, fuel sulfur percent by weight, and periodic stack testing for particulate matter.

CEMS and COMS,
If boiler 5 is operated at greater than 30% of the annual capacity factor, then continuous emission monitors (CEMs) shall be required for NO_X, CO_2 or O_2, and opacity, and the CEMs shall be operated in accordance with the instrument monitoring and record keeping requirements in Chapter 117 of the Department's regulations. Continuous emission monitors are not required if the annual capacity factor does not exceed 30%.

C. <u>Boilers 6 and 7, oil boilers</u>

Unit Descriptions
Boilers 6 and 7 are Riley Stoker boilers each with a maximum design heat input capacity of 226 MMBtu/hr firing fuel oil and waste oil. The boilers were both installed in 1976, prior to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Db applicability date. The boilers are each below 250 MMBtu/hr, the applicability capacity threshold of 40 CFR Part 60, Subpart D. Emissions exit through a 269 ft stack that serves boilers 5, 6, and 7.

Boilers 6 and 7 are subject to Chapter 138, NO_X Reasonably Available Control Technology and were part of the facility's NO_X RACT submittal. Boilers 6 and 7 are subject to 40 CFR Part 63, Subpart DDDDD.

Control Equipment
Control equipment for boilers 6 and 7 consists of multiple centrifugal cyclones.

Streamlining
1. Opacity
   Chapter 101, Sections (2)(B)(1)(a)(i) and (2)(B)(5)(i) of the Department's regulations contains the applicable opacity standard for boilers 6 and 7. No streamlining is required for opacity.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(A)(1) contains an applicable PM lb/MMBtu emission standard (0.2 lb/MMBtu).
   b. BPT establishes an applicable PM lb/MMBtu emission standard (0.075 lb/MMBtu).
   c. BPT establishes the applicable lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the PM lb/MMBtu emission limits for boilers 6 and 7, therefore only the more stringent BPT lb/MMBtu limit is included in this license.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit for boilers 6 and 7. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. BPT establishes an applicable fuel sulfur content standard (0.7%).
   c. BPT establishes the applicable SO_2 lb/hr emission limit for boilers 6 and 7. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the fuel sulfur content standard for boilers 6 and 7, therefore only the more stringent BPT fuel sulfur content is included in this license.

5. Nitrogen Oxides (NO_X)
   a. Chapter 138, section (3)(B)(1) of the Department's regulations contains the applicable NO_X lb/MMBtu emission limit for boilers 6 and 7.
   b. BPT establishes the only applicable NO_X lb/hr emission limit.
   No streamlining is required for the lb/MMBtu or the lb/hr limits.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit. No streamlining is required for the lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit. No streamlining is required for the lb/hr limit.

Periodic Monitoring
Periodic monitoring shall consist of maintaining fuel use records, annual inspection of the multiclones if the boilers are operated for more than 1000 hours in any calendar year, hours of operation, fuel sulfur percent by weight, and periodic stack testing for particulate matter.

CEMS and COMS
If the boilers are operated at greater than 30% of the annual capacity factor, then continuous emission monitors (CEMs) shall be required for NO_X, CO_2 or O_2, and opacity, and the CEMs shall be operated in accordance with the instrument monitoring and record keeping requirements in Chapter 117 of the Department's regulations. Continuous emission monitors are not required if the annual capacity factors do not exceed 30%.

D. Boiler 8, multi-fuel boiler

Unit Description
Boiler 8 is a Combustion Engineering boiler manufactured in 1982 and started operations at Bucksport in 1984. Boiler 8 has a maximum design heat input capacity of 814 MMBtu/hr and is licensed to fire fuel oil (including specification waste oil, off-specification waste oil, and fuel oil), biomass (including wood waste, wood chips, bark, paper mill sludge, waste papers, and fiber core ends), bituminous coal, natural gas, and tire-derived fuel (TDF). The boiler is subject to New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart D and Subpart A. Emissions exit through a 362 ft stack.

Boiler 8 is subject to Chapter 138, NO_X Reasonably Available Control Technology and was part of the facility's NO_X RACT submittal. Boiler 8 is subject to 40 CFR Part 63, Subpart DDDDD.

Control Equipment
Control equipment for boiler 8 consists of multiple centrifugal cyclones and an electrostatic precipitator (ESP).

Streamlining

1. Opacity
   a. Chapter 101, Section (2)(B)(1)(a)(i) of the Department's regulations contains an applicable opacity standard for boiler 8 (30%, except for two six minute block averages in a 3-hour period).
   b. 40 CFR Part 60, Subpart D, Section 60.42(a)(2) contains an applicable opacity standard for boiler 8 (20%, except for one six minute average in an hour not to exceed 27%).

   International Paper accepts streamlining for the opacity limit for boiler 8, therefore only the more stringent 40 CFR Part 60, Section 60.42(a)(2) opacity limit is included in this license.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(B)(1) contains an applicable PM lb/MMBtu emission standard (0.06 lb/MMBtu).
   b. 40 CFR Part 60, Subpart D, section 60.42(a)(1) contains an applicable PM lb/MMBtu emission standard (0.10 lb/MMBtu).
   c. BPT establishes the applicable lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the PM lb/MMBtu emission limit for boiler 8, therefore only the more stringent Chapter 103 lb/MMBtu limit is included in this license.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit for boiler 8. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. 40 CFR Part 60, Section 60.43(a)(1) contains the applicable SO_2 lb/MMBtu emission limit when firing liquid fossil fuels, or liquid fossil fuel and wood residue (0.8 lb/MMBtu) and 40 CFR Part 60, Section 60.43(a)(2) contains the applicable SO_2 lb/MMBtu emission limit when firing solid fossil fuel, or solid fossil fuel and wood residue (1.2 lb/MMBtu). The 0.8 lb/MMBtu limit for liquid fuels correlates to a more stringent fuel sulfur content than 2%.
   c. BPT establishes the applicable SO_2 lb/hr emission limit for boiler 8. No streamlining is required for the lb/hr limit.

International Paper accepts streamlining for the lb/MMBtu and fuel sulfur content standard for boiler 8, therefore the more stringent lb/MMBtu limits are included in this license.

5. Nitrogen Oxides (NO_X)
   a. Chapter 138, Section (4) of the Department's regulations contains applicable NO_X lb/MMBtu emission limits for boiler 8 (0.4 lb/MMBtu for oil; 0.3 for biomass; 0.4 for biomass and oil; and 0.45 for biomass and coal).
   b. 40 CFR Part 60, Section 60.44 contains applicable NO_X lb/MMBtu emission limits for boiler 8 (0.2 lb/MMBtu for gaseous fossil fuel; 0.3 lb/MMBtu for liquid fossil fuels, liquid fossil fuel and wood residue, or gaseous fossil fuel and wood residue; 0.7 lb/MMBtu for solid fossil fuels or solid fossil fuel and wood residue).
   b. BPT establishes the applicable NO_X lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the NO_X lb/MMBtu emission limit for boiler 8, therefore only the more stringent of limits is used for each fuel type. 40 CFR Part 60, Section 60.44 limits are included in this license for all fuels except when firing biomass and coal. When firing biomass and coal, the Chapter 138 limits shall apply.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit. No streamlining is required for the lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit. No streamlining is required for the lb/hr limit.

8. Data Collection and Monitor Up-time
   International Paper accepts streamlining for data collection requirements and monitor uptime for operation of their COMS and CEMS. 40 CFR Part 60, Sections 60.45 and 60.46 and Chapter 117 of the Department's regulations are applicable. International Paper will establish the applicability and precedence of the various monitoring requirements in a monitoring protocol to be submitted and accepted by the Department.

Periodic Monitoring

Periodic monitoring for boiler 8 shall consist of maintaining fuel use records, fuel oil sulfur percent by weight, a log of ESP secondary T/R voltage and current readings, stack testing for particulate matter every two calendar years, and

inspection and maintenance of pollution control equipment (including following a multiclone maintenance plan).

(Note that the periodic monitoring in this license relating to the boiler 8 ESP will be superceded by the continuous monitoring system requirements of 40 CFR Part 63, Subpart DDDDD once the CMS is approved)

CEMS and COMS
Continuous emission monitors (CEMs) shall be required for NO_X, SO_2, CO_2 or O_2, and a continuous opacity monitor (COM) shall be required for opacity. The CEMs and COM shall be operated in accordance with a monitoring plan to be submitted by International Paper, which will incorporate 40 CFR Part 60, Sections 60.45 and Chapter 117 of the Department's regulations.

E. Combined Cycle Gas Turbine

Unit Description
The 175 MW combined cycle gas turbine, consisting of a combustion turbine with dry low NO_X burners and the associated electrical generator, a non-fired heat recovery steam generator, and ancillary equipment, commenced commercial operation in October 2000. The turbine, licensed to fire natural gas and fuel oil, has a maximum design heat input capacity of approximately 1963 MMBtu/hr on gas and 2082 MMBtu/hr on fuel oil. Emissions exit through a 250 ft stack.

The gas turbine was licensed through a BACT determination and license issued September 14, 1998 (A-22-71-N-A) and was amended on July 12, 1999 (A-22-71-P-M), July 2, 2001 (A-22-71-V-M), September 28, 2001 (A-22-71-X-M), March 11, 2003 (A-22-71-AA-M), and April 29, 2003 (A-22-71-AB-A). The gas turbine is not subject to Chapter 138 of the Department's regulations, NO_X RACT, since BACT is more stringent than RACT.

The gas turbine is subject to 40 CFR Part 60 Subparts GG, and A. The gas turbine is also subject to 40 CFR Part 72 and Part 75, as noted below.

Acid Rain Program
In accordance with the Acid Rain provisions in 40 CFR Part 72, the combustion turbine is an affected unit. Therefore, International Paper is required to have a Phase II acid rain permit for the turbine and is required to obtain allowances to cover SO_2 emissions from the unit. The turbine is also subject to continuous emission monitoring requirements contained in 40 CFR Part 75. International Paper was issued an acid rain permit on March 17, 1999 and submitted a timely renewal application on June 10, 2004.

Control Equipment
Control equipment for the gas turbine consists of dry low NO_X burners and water injection during the firing of oil.

Streamlining
1. Opacity
   a. Chapter 101, Section (2)(B)(1)(f) of the Department's regulations contains an applicable opacity standard for fuel burning units not specifically listed in the regulation - this would apply to the gas turbine (30%, except for two six minute block averages in a 3-hour period).
   b. The previous BACT analysis established an opacity limit for the gas turbine (20%, except for one six minute average in an hour not to exceed 27%). The BACT limit is now BPT.

   International Paper accepts streamlining for the opacity limit for the gas turbine, therefore only the more stringent BPT opacity limit is included in this license.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(B)(1) contains an applicable PM lb/MMBtu emission standard (0.06 lb/MMBtu).
   b. The previous BACT determination established applicable lb/hr emission limits. These BPT lb/hr limits correlate to a much lower lb/MMBtu than the limit list in (a), and are therefore more stringent.

   International Paper accepts streamlining for the PM emission limits for the gas turbine, therefore only the more stringent BPT lb/hr limits are included in this license.

3. PM_{10}
   The previous BACT analysis established the applicable PM_{10} lb/hr emission limits for the gas turbine. No streamlining is required for the lb/hr limits.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. The previous BACT analysis established an applicable liquid fuel sulfur content standard (0.05%).
   c. 40 CFR Part 60, Sections 60.333(a) and (b) contain applicable standards and fuel sulfur content for gaseous fuels (SO_2 in excess of 0.015% by volume at 15%O_2 dry and fuel sulfur content of 0.8%).
   d. The previous BACT analysis established applicable SO_2 lb/hr emission limits for the gas turbine. These BPT lb/hr limits are based on the fuel

content listed in (b), and correlate to a lower limit than those listed in (c), and are therefore more stringent.

International Paper accepts streamlining for the SO_2 emission limits for the gas turbine, therefore only the more stringent BPT lb/hr limits are included in this license.

International Paper accepts streamlining for the fuel sulfur content for gas turbine, therefore only the more stringent BPT fuel sulfur content is included in this license.

5. Nitrogen Oxides (NO_X)
   a. 40 CFR Part 60, Section 60.332(a)(1) contains applicable NO_X requirements based on an equation, which inputs the manufacturer's rated load and the fuel-bound nitrogen.
   b. A previous BACT analysis established applicable NO_X ppm emission limits (9 ppm gas and 42 ppm oil) and these are now BPT. These ppm limits correlate to a more stringent limit than the limit in (a).
   c. A previous BACT analysis established applicable NO_X lb/hr emission limits and these are now BPT. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the NO_X concentration emission limits for the gas turbine, therefore only the more stringent BPT ppm limits are included in this license.

6. Carbon Monoxide (CO)
   a. A previous BACT analysis established applicable CO ppm emission limits (9 ppm gas and 15 ppm oil) and the limits are now BPT. No streamlining is required for the ppm limits.
   b. A previous BACT analysis established applicable CO lb/hr emission limits and the limits are now BPT. No streamlining is required for the lb/hr limits.

7. Volatile Organic Compounds (VOC)
   A previous BACT analysis established applicable VOC lb/hr emission limits and the limits are now BPT. No streamlining is required for the lb/hr limits.

8. NO_X Monitoring and Water/Steam Injection
   a. 40 CFR Part 60, Subpart GG, Section 60.334(a) contains a requirement to continuously monitor and record the fuel consumption and the ratio of water or steam to fuel oil being fired into the turbine on an hourly block average basis when using water or steam injection to control NO_X emissions.

b. 40 CFR Part 60, Subpart GG, Section 60.334(b) contains a requirement to continuously monitor nitrogen content of the fuel being fired in the turbine.
c. 40 CFR Part 75 contains a requirement to operate a NO_X CEM.

International Paper accepts streamlining for NO_X emissions monitoring requirements for the gas turbine, therefore only the more stringent 40 CFR Part 75 CEM requirement is included in this license.

9. Data Collection and Monitor Up-time
International Paper accepts streamlining for data collection requirements and monitor uptime for operation of the CEMS. 40 CFR Part 60, Subpart GG, 40 CFR Part 75, and Chapter 117 of the Department's regulations are applicable. International Paper will establish the applicability and precedence of the various monitoring requirements in a monitoring protocol submitted and accepted by the Department.

Periodic Monitoring
Periodic monitoring shall consist of maintaining fuel use records and fuel sulfur content by weight as required, and fuel firing rate to the turbine.

CEMS
Continuous emission monitors (CEMs) shall be required for NO_X, CO, and CO_2 or O_2, and the CEMs shall be operated in accordance with the instrument monitoring and record keeping requirements in Chapter 117 of the Department's regulations, 40 CFR Part 75, and 40 CFR Part 60, as stated in the submitted monitoring protocol.

F. Stationary Internal Combustion Engines (SICE)

Unit Description
International Paper has a number of SICEs. Some of the SICEs on site are less than 3 MMBtu/hr. These units are considered insignificant activities if they fire propane, natural gas, or diesel fuel with a sulfur content not to exceed 0.05%. International Paper shall keep records of the sulfur content of diesel fuel fired in these units to demonstrate compliance with the insignificant activity threshold.

International Paper may operate temporary SICEs greater than 3 MMBtu/hr on site for 500 hours or less duration, per unit. Records shall be kept documenting the fuel sulfur content (not to exceed 0.05%) and the hours of operation for any temporary units greater than 3 MMBtu/hr.

Per the insignificant activity listed in Chapter 140 of the Department's regulations, Appendix B(A)(114), the Department may grant approval for

temporary air emission related activities. Temporary non-road mobile engines less than 3 MMBtu/hr may be brought on site for limited use during maintenance, construction activities and/or during emergencies and may be considered insignificant. The non-road mobile engines shall not be deemed temporary if they are on site longer than 12 consecutive months. International Paper does not need to maintain fuel use records for the units, but must be able to produce documents demonstrating that no units are on site for more than 12 months, if requested by the Department. Non-road engines (per the federal definition) are regulated under 40 CFR Part 1068 and are not subject to the MACT standard for Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ). The federal non-road engine definition includes:

> '…in or on a piece of equipment that is self-propelled or is self-propelled and performs another function (bulldozers, garden tractors, etc); or is propelled while performing it's function (lawnmowers); or that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indications of transportability include wheels, skids, carrying handles, dolly, trailer, or platform. A unit is not a non-road engine if it propels a motor vehicle or a vehicle for competition or is subject to Section 202 or the Clean Air Act (CAA); the engine is regulated by an NSPS under Section 111 of the CAA; or if it remains at a location for more than 12 consecutive months.'

Three of the stationary internal combustion engines at the facility are greater than 3 MMBtu/hr and therefore need to be included in the license. Onan #1 and Onan #2 are 600 kw units (6.26 MMBtu/hr each) and are located adjacent to the head works building on the west side of the mill. Each generator provides emergency backup power to two pumps. The four pumps are used pump all the mill's wastewater to the treatment plant. Onan #3 is a 500kW unit (4.92 MMBtu/hr) and is located adjacent to the secondary lift station. The generator provides emergency backup power to four wastewater lift pumps, two return sludge pumps, two clarifier rake drives, and two sump pumps. The sulfur content of the diesel fuel fired in the units is limited to 0.05% sulfur. Each unit is limited to 500 hours of operation a year, based on a 12 month rolling total.

The three emergency diesel engines were licensed through a BACT determination and license issued August 15, 2002 (A-22-71-Y-A). The three SICEs are not subject to Chapter 138 of the Department's regulations, NO_X RACT, since BACT was applicable. These three engines are subject to 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines, but there are no additional requirements beyond the BACT findings.

Streamlining

1. Opacity
   Chapter 101, Section (2)(B)(1)(d) of the Department's regulations contains the applicable opacity standard for Onan #1, #2, and #3 (20%, except for 2 six minute averages in a three hour period). No streamlining is required for opacity.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(B)(1) contains the applicable PM lb/MMBtu emission standard (0.12 lb/MMBtu). No streamlining is required for the lb/MMBtu limit.
   b. BPT establishes the applicable lb/hr emission limit. No streamlining is required for the lb/hr limit.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. BPT establishes an applicable fuel sulfur content standard (0.05%).
   c. BPT establishes the applicable SO_2 lb/hr emission limit. No streamlining is required for the lb/hr limit.

   International Paper accepts streamlining for the fuel sulfur content standard for the emergency diesel generators, therefore only the more stringent BPT fuel sulfur content is included in this license.

5. Nitrogen Oxides (NO_X)
   BPT establishes the applicable NO_X lb/hr emission limits. No streamlining is required for the lb/hr limit.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit. No streamlining is required for the lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit. No streamlining is required for the lb/hr limit.

Periodic Monitoring

Periodic monitoring for the SICEs shall consist of maintaining records of fuel sulfur percent by weight and hours of operation.

G. Solvent Degreasers

Unit Description
International Paper operates various cold cleaning degreasers. These degreasers are currently exempt from Chapter 130 of the Department's regulations since the degreasers used at International Paper consist of detergent/soap and water containing less than or equal to 5% VOC by weight. However, if a solvent degreaser is used by International Paper at a later time, the facility shall comply with the applicable Chapter 130 requirements.

Periodic Monitoring
Periodic monitoring for the current degreaser units shall consist of keeping the MSDS sheet for the solvents (detergents) on file.

H. Coal Processing Equipment

Unit Description
The various pieces of equipment in the coal processing operations are controlled with baghouses to prevent particulate matter emissions. The units were installed in 1984. The following each have a baghouse: the coal unloading area, the coal conveying and the coal crushing and the coal screening (all three use the same baghouse), the coal conveyor transfer points (three points using one baghouse), the coal storage silo 1, the coal storage silo 2, the stoker coal bunker, the pulverized coal bunker A, the pulverized coal bunker B, and the pulverized coal bunker C.

The coal processing equipment is subject to 40 CFR Part 60, Subpart Y.

Streamlining
1. Opacity
   a. Chapter 101, Section (2)(B)(3)(c) of the Department's regulations contains an applicable opacity standard for baghouses. (10%, except one 6 minute average in one hour).
   b. 40 CFR, Part 60, Section 60.252(c) contains an applicable opacity standard for coal processing, conveying, and storage equipment (20% opacity).

   International Paper accepts streamlining for the opacity limit on the coal processing baghouses, therefore only the more stringent Chapter 101 baghouse opacity limit is included in this license. No streamlining is applicable to the other portions of the coal processing equipment – the Subpart Y opacity applies.

2. Particulate Matter (PM)
   a. Chapter 105 contains applicable PM emission standards for process sources. Meeting the opacity limit meets the Chapter 105 requirements.
   b. Chapter 101 establishes an applicable opacity limit for the baghouses.

   International Paper accepts streamlining for the PM emissions from the coal processing equipment, therefore only the more stringent Chapter 101 opacity limit is included in this license.

Periodic Monitoring
Periodic monitoring for the coal processing equipment, when operated, shall consist of record keeping of baghouse inspection and maintenance, and all process and control equipment malfunctions that cause excess emissions.

I. Starch and Clay Process Equipment

Unit Description
The clay unloading system is controlled by a baghouse installed in 1946. The starch silos 1 and 2 are both controlled by one baghouse, installed in 1998. The starch weigh hoppers 1 and 2 are both controlled by one baghouse, installed in 1974.

Streamlining
1. Opacity
   Chapter 101, Section (2)(B)(3)(c) of the Department's regulations contains the applicable opacity standards for baghouses. (10%, except one 6 minute average in one hour). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 contains an applicable PM emission standards for process sources. Meeting the opacity limit meets the Chapter 105 requirements.
   b. Chapter 101 establishes an applicable opacity limit for the baghouses.

   International Paper accepts streamlining for the PM emissions from the clay and starch processing equipment, therefore only the more stringent Chapter 101 opacity limit is included in this license.

Periodic Monitoring
Periodic monitoring for the starch and clay processing equipment shall consist of baghouse inspection and maintenance, and all process and control equipment malfunctions that cause excess emissions.

J. Paper Machines and Off Machine Coater

Unit Description
International Paper has four paper machines, installed on the following dates: Paper Machine 1 (1930), Paper Machine 2 (1930), Paper Machine 4 (1966), and Paper Machine 5 (1976).

The off machine coater was installed in 1966 and has a total capacity of 48 MMBtu/hr firing propane or natural gas. The off machine coater has four sections with four 12 MMBtu/hr burners (adding up to the 48 MMBtu/hr total). Each section has its own air circulation loop through the burners (i.e. – air cap heaters), into the drying area, then recirculation back. There is a roof vent for each section.

The paper machines are subject to Chapter 123 of the Department's regulations, Paper Coating.

The off machine coater is subject to 40 CFR Part 63, Subpart JJJJ. The off machine coater was subject to Chapter 138 of the Department's regulations, NO_X RACT. It was considered a miscellaneous stationary NO_X source and an alternative RACT analysis was submitted. The propane fired burners' 0.14 lb/MMBtu limit was determined to be meeting NO_X RACT.

The chemicals associated with the paper machines and off machine coater include wet end additives, starch, clays, binders, fillers, dyes, dispersants, trial chemicals, and process cleaning chemicals.

Streamlining
1. Opacity
   a. Chapter 101, Section (2)(B)(1)(f) of the Department's regulations contains an applicable opacity standard for fuel burning sources not specifically listed in the regulation. (30%, except two 6 minute average in a three hour period).
   b. Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains an applicable opacity standard for process sources not specifically listed in the regulation. (20%, except for one 6 minute average in a 1 hour period).

   International Paper accepts streamlining for the opacity for the four exhaust vents from the off machine coater system, therefore only the more stringent Chapter 101 process opacity limit is included in this license. This lower opacity limit is used as a surrogate for the other pollutants – if International Paper meets the opacity limit, the burners are deemed to be running efficiently and in compliance for PM, PM_{10}, SO_2, CO, and VOC.

2. Nitrogen Oxides (NO_X)
   Chapter 138 of the Department's regulations, NO_X RACT, contains an alternative RACT analysis. The alternative RACT limit for the burners is 0.14 lb/MMBtu. No streamlining is required for the NO_X lb/MMBtu limit.

Periodic Monitoring
Periodic monitoring for the off machine coater includes maintaining records of fuel use.

K. Groundwood and Thermomechanical Pulping Process

Unit Description
International Paper operates a groundwood pulping process, installed in 1930, in which logs are pulped through a mechanical grinding process. A thermomechanical pulping process (TMP) was installed in 1976, which uses wood chips to produce pulp through thermomechanical refining. The chemicals associated with these two pulping processes are brightening agents, process additives, and cleaners.

Units in the groundwood and thermomechanical pulping process were subject to Chapter 134, VOC RACT. International Paper submitted an alternative RACT analysis for the grinder vents in the groundwood pulping operations and for the primary and secondary refiner vent of the TMP operations. The VOC RACT determination was that the process did not need additional controls at that time for the control of VOCs from the units.

The grinder VOC emission rate was estimated to be 2.03 lb/ADTP based on several tests (as carbon) in the mid 1990's by NCASI (National Council on Air and Stream Improvement) and the Champion technology group. The TMP VOC emission rate was estimated to be 0.52 lb/ADTP. These factors will be used for annual fee purposes calculations only and may be revised in the future.

International Paper operates several cyclones in the TMP process to convey and separate product.

Streamlining
Opacity
Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains the applicable opacity standards for process sources not specifically listed in the regulation. (20%, except one 6 minute average in a one hour period). No streamlining is required for the opacity limit on the cyclones.

L. Wastewater Treatment Plant

Unit Description
International Paper operates a wastewater treatment plant that was installed in 1972. The chemicals associated with the treatment process include polymers, defoamers, nutrients, and pH control chemicals.

The wastewater treatment plant was subject to Chapter 134 of the Department's regulations, VOC RACT.

Periodic Monitoring
Periodic monitoring for the wastewater treatment plant includes maintaining a valid NPDES (or MPDES) permit, per VOC RACT requirements.

M. Roll Grinding Operations

Unit Description
International Paper has three roll grinding operations, two are controlled with wet scrubbers and one is controlled with a baghouse. The roll grinding operations were installed in 1959, 1975, and 1976. One roll grinder (lathe) is used for fill rolls (cloth) and is exhausted through a baghouse. Two roll grinders are used for rubber and steel. When grinding rubber, the wet scrubbers are used. When grinding steel, no control is used since the particulate is heavy and falls rather than exhausting in the air therefore, the vacuum to the wet scrubber is not operated.

Streamlining
1. Opacity
   a. Chapter 101, Section (2)(B)(3)(c) of the Department's regulations contains the applicable opacity standard for baghouses (10%, except one 6 minute average in one hour). No streamlining is required for the opacity limit for the baghouses.
   b. Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains the applicable opacity standard for the wet scrubbers in the section of process sources not specifically listed in the regulation (20%, except one 6 minute average in one hour). No streamlining is required for the opacity limit for the wet scrubbers.

2. Particulate Matter (PM)
   a. Chapter 105 contains an applicable PM emission standards for process sources. Meeting the opacity limit for the baghouse and using wet scrubbers meets the Chapter 105 requirements.
   b. Chapter 101 establishes an applicable opacity limit for the baghouse.

International Paper accepts streamlining for the PM emissions from the roll grinding operations, therefore only the more stringent Chapter 101 baghouse and wet scrubber opacity limits are included in this license.

Periodic Monitoring
Periodic monitoring for the roll grinding operations consists of record keeping of control equipment inspection and maintenance, and record keeping of all process and control equipment malfunctions that cause excess emissions.

N. Fugitive Emissions

Unit Description
International Paper has various areas with fugitive particulate matter emissions including material stockpiles, paved, and unpaved surfaces. These areas shall be maintained to minimize emissions.

Streamlining
Opacity
Chapter 101, Section (2)(B)(4)(a) of the Department's regulations contains the applicable opacity standard for fugitive emissions (20%, except 5 minutes in one hour). No streamlining is required for the opacity limit.

O. Gasoline Tank

Unit Description
International Paper is licensed to operate a gasoline storage tank.
The gasoline storage tank is subject to Chapter 118 of the Department's regulations.

Periodic Monitoring
Periodic monitoring for the gasoline storage tank consists of maintaining records of the monthly and annual throughput of gasoline.

P. Facility Emissions

Total Licensed Annual Emission for the Facility
Tons/year
(used to calculate the annual license fee)

Equipment	**PM**	**PM_{10}**	**SO_2**	**NO_X**	**CO**	**VOC***
Boilers 5, 6, 7, 8, and the gas turbine	351	341	2800	1410	628	205
Off Machine Coater				29		
TMP Process Vents						28.5
Groundwood Process Vents						144.5
Diesel Emergency Generators (Onan 1, 2, and 3 total)	2.3	2.3	0.3	17.4	1.7	0.6
TOTALS	**353.3**	**353.3**	**2800.3**	**1456.4**	**629.7**	**378.6**

* Paper machine VOC are noted, but not included since they are highly variable and unquantified at this time. TMP and groundwood VOC calculations are based on maximum capacity and the factors included in the finding of fact, Section II (K).

III. AIR QUALITY ANALYSIS

International Paper previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. The most recent air quality analysis was performed for air emission license amendment A-22-71-P-M. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-22-70-A-I pursuant to MEDEP Chapter 140 and the pre-construction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to International Paper pursuant to the Department's pre-construction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition that is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD STATEMENTS

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 16, 1998 and in subsequent addendum submittals:

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
i.	Entire Mill	MEDEP Chapter 107	Sulfur Dioxide Standards for Sulfite Pulp Mills	The IP mill is not a sulfite pulp mill
ii.	Entire Mill (#6 oil tanks, gasoline tanks)	MEDEP Chapter 111	Petroleum Liquid Storage Vapor Control	All petroleum tanks at the facility greater than 39,000 gal in volume have true vapor pressures less than 1 psia
iii.	Entire Mill	MEDEP Chapter 112	Petroleum Liquid Transfer Vapor Recovery	IP does not operate any equipment subject to this regulation
iv.	Entire Mill	MEDEP Chapter 122	Chlorine and Chlorine Dioxide Standard	IP does not operate a bleach plant that utilizes chlorine or chlorine dioxide

v.	Entire Mill	MEDEP Chapter 124	Total Reduced Sulfur Control from Kraft Pulp Mills	The IP mill is not a kraft pulp mill
vi.	Entire Mill	MEDEP Chapter 129	Surface Coating Facilities	IP does not operate activities subject to this Chapter
vii.	Printing Presses	MEDEP Chapter 132	Graphic Arts-Rotogravure and Flexography	Chapter 132 does not apply to the proof type printing that IP operates
viii.	Boilers 5, 6, 7, and 8; Paper machines 1, 2, 4, and 5; Off Machine Coater	MEDEP Chapter 134	VOC RACT	Boilers, Paper Machines, and the Off Machine Coater are exempt from VOC RACT (Section 1(C)(7))
ix.	Entire Mill	MEDEP Chapter 135	Hexavalent Chromium Particulate Emission Standard	IP does not operate activities subject to this Chapter and fuel fired has an aggregate chromium concentration less than 0.05% by weight
x	Boiler 8	MEDEP Chapter 121	Emission Testing of Resource Recovery Facilities	Boiler 8 does not combust MSW and is not a resource recovery facility
xi.	Entire Mill	40 CFR Part 60, Subpart BB	NSPS for Kraft Pulp Mills	The IP mill is not a Kraft mill
xii.	Cold Cleaning Degreasers	40 CFR Part 63, Subpart T	NESHAP for Halogenated Solvent Cleaning	Degreasers do not use solvents which contain chemicals subject to this regulation in concentration greater than 5% by weight
xiii.	Landfill	40 CFR Part 60, Subparts Cc and WWW	Emission Guidelines for Municipal Solid Waste Landfill and NSPS for Municipal Solid Waste Landfill	IP's landfill is not a Municipal Solid Waste landfill
xiv.	Boiler #8	40 CFR Part 61, Subpart E	Mercury NESHAP	Does not apply to Pulp and Paper Mill sludge

xv.	Boiler #8	40 CFR Part 60, Subpart Da	NSPS for Electric Utility Steam Generators Constructed after Sept. 18, 1978	Boiler #8 is not considered an electric utility.
xvi.	Boiler #8	MEDEP Chapter 104	Incinerator Particulate Emission Standard	Boiler #8 is not considered an incinerator.
xvii.	Gas Turbine	40 CFR Part 63, Subpart B	NESHAP for Major New Source	EPA determined that Subpart B is applicable to stationary combustion turbines only if they triggered the threshold for a major new source. Emission estimates based on HAP emission factors show the turbine is not a major source.
xviii.	Gas Turbine	40 CFR Part 60, Subpart D	NSPS for Fossil-Fuel-Fired Steam Generators Constructed after Aug. 17, 1971	The turbine is not considered a steam generator since there are no burners in the steam generating section of the unit
xviv.	Gas Turbine	40 CFR Part 60, Subpart Da	NSPS for Electric Utility Steam Generators Constructed after Sept. 18, 1978	The turbine is not considered a steam generator since there are no burners in the steam generating section of the unit.
xvv.	Gas Turbine	40 CFR Part 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units	The turbine is not considered a steam generator since there are no burners in the steam generating section of the unit.
xvvi.	Paper Coating Operations	40 CFR Part 63, Subpart HHHHH	Misc. Coating Manufacturing	The coating prep area is an affiliated operation to the off-machine coater, which is an affected source under 40 CFR Part 63 Subpart JJJJ

xvvii.	Size presses, size press alternatives, and on-machine coaters that apply sizing or water based clay	40 CFR Part 63, Subpart JJJJ	Paper and Other Web Coating Standards	Size presses or size press alternatives (SP/SPA) and on-machine coaters that apply sizing or water-based clay are exempt from 40 CFR Part 63, Subpart JJJJ per an EPA clarification letter dated November 19, 2003

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;
Enforceable by State-only

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;
Enforceable by State-only

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

2. to demonstrate compliance with the applicable emission standards; or

3. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;

B. The compliance status;

C. Whether compliance was continuous or intermittent;

D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

E. Such other facts as the Department may require to determine the compliance status of the source;

SPECIAL CONDITIONS

(14) **Boilers 5, 6, and 7 (Oil Fired Boilers)**

A. Emissions from Boiler 5 (371 MMBtu/hr) shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.075	MEDEP Chapter 140, BPT	-
NO_X	0.55	MEDEP Chapter 140,BPT	**Enforceable by State-only**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	27.8	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	27.8	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	296.8	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	204.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	13.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	1.9	MEDEP Chapter 140, BPT	**Enforceable by State-only**

B. International Paper shall operate Boiler 5 with low NO_X burners. [MEDEP Chapter 138, NO_X RACT]

C. Emissions from Boilers 6 and 7 (226 MMBtu/hr each) shall each not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.075	MEDEP Chapter 140, BPT	-
NO_X	0.30	MEDEP Chapter 138, NO_X RACT	-

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	17.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	17.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	180.8	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	67.8	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	7.9	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	1.1	MEDEP Chapter 140, BPT	**Enforceable by State-only**

D. International Paper shall control particulate matter emissions from Boilers 6 and 7 with the operation and maintenance of multicyclones. [MEDEP Chapter 140, BPT]

E. International Paper shall operate boilers 5, 6, and 7 such that visible emissions from the common stack does not exceed 30% opacity on a six (6) minute block average basis, except for no more than three (3) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 101]

F. Boiler Capacity Limits – CEMS and individual COMS

1. International Paper shall operate boilers 5, 6, and 7 such that each boiler does not exceed an annual capacity factor of 30% demonstrated by firing less than 7,116,700 gal/yr of fuel oil for boiler 5 and less than 4,335,240 gal/year of fuel oil each for boilers 6 and 7. International Paper shall maintain fuel use records for boilers 5, 6, and 7 for each calendar year. (Annual capacity factor means the ratio between the actual heat input to a steam generating unit from fuels during a calendar year, and the potential heat input to the steam generating unit had it been operating for 8760 hours at a maximum steady state design heat input capacity).
2. Upon documentation that the annual fuel use has exceeded the limits above for boilers 5, 6, and 7, within 90 days thereafter, International Paper shall install, calibrate, maintain, and operate continuous monitoring systems for NO_X for the individual boiler or boilers that exceed the limit and an opacity monitor in the common stack or on the individual boiler if only one boiler is to be operated, in accordance with the performance specifications set forth in 40 CFR Part 60, Appendix B.

[MEDEP, Chapter 117] **Enforceable by State-only**

G. Fuel for Boilers 5, 6, and 7
International Paper is licensed to fire off-specification and specification waste oil, and fuel oil with a maximum fuel sulfur content of 0.7% sulfur in boilers 5, 6, and 7. [MEDEP Chapter 140, BPT]

H. Boilers 5, 6, and 7 Periodic Monitoring
1. International Paper shall maintain monthly records of the fuel use for the three boilers. The fuel use records shall include sulfur content per delivery. The waste oil use records may be on a monthly mill total basis and not a per boiler basis.
2. International Paper shall keep records of the results of the analysis(es) of representative waste oil sample(s) and shall test a representative sample annually or more frequently if changes occur in the process that may effect the composition of the waste oil collected. The results of the analyses shall be kept on-site.
3. International Paper shall maintain a log of the pressure drop across the multicylcones for boilers 6 and 7 and record the pressure drop once per day when in the boilers are in operation.
4. International Paper shall maintain a log detailing the annual overhaul and all routine and non-routine maintenance on each multicyclone on boilers 6 and 7. The annual overhaul must be performed only if either boiler is operated more than 1000 hours per year. International Paper shall keep a log documenting the date and nature of all multicyclone failures.
5. International Paper shall maintain records of hours of operation for boilers 5, 6 and 7.

[MEDEP Chapter 140, BPT]

(15) **Boiler 8 (Multi-fuel boiler)**

A. International Paper is licensed to fire the following fuels in boiler 8 (814 MMBtu/hr): fuel oil (including fuel oil, off-specification waste oil, and specification waste oil), natural gas, tire derived fuel (TDF), biomass (including wood waste, wood chips, bark, mill waste treatment sludge, paper roll core ends, and waste papers), and coal. The fuel oil sulfur content shall not exceed 0.7% by weight, demonstrated through record keeping.[MEDEP Chapter 140, BPT] **Enforceable by State-only**

B. The TDF fired in boiler 8 shall have properties similar to the TDF that was used in the initial test burns (i.e. approximately 98% of the bead wire removed and approximately 70% of the belt wire removed) unless emission testing shows that the emission limits can be met while burning TDF with greater amounts of wire present. Records shall be maintained for a minimum of six (6) years documenting the names of International Paper's TDF suppliers and their locations. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. TDF shall not be charged to boiler 8 at a rate that exceeds 3.5 ton/hr on a monthly average unless emission testing approved by the Department demonstrates compliance with the boiler emission limits at greater TDF firing rates. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

D. International Paper shall control particulate matter emissions from Boiler 8 with the operation and maintenance of a multicyclone followed by an electrostatic precipitator (ESP). [MEDEP Chapter 140, BPT]

E. International Paper shall continue to document and submit start-up opacity records on a semi-annual basis until July 31, 2005. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

F. Emissions from Boiler 8 shall not exceed the following:

	Lb/MMBtu	Origin and Authority
PM	0.06	MEDEP Chapter 103
SO_2	0.80[a] (3-hr rolling ave) 1.2[b] (3-hr rolling ave)	40 CFR §60.43 40 CFR §60.43
NO_X	0.20[c] (3-hr rolling ave) 0.30[d] (3-hr rolling ave) 0.45[e] (24 hr block ave)	40 CFR §60.44 40 CFR §60.44 MEDEP Chapter 138,NO_X RACT

[a] 0.80 lb SO_2/MMBtu applies when firing oil, natural gas or a combination of natural gas, oil, TDF or biomass (no coal).

[b] 1.2 lb SO_2/MMBtu applies when firing coal or a combination of coal, TDF and biomass. When coal and oil are being fired simultaneously, the applicable SO_2 emission standards shall be determined by prorating using the formulas in 40 CFR Part 60.43(b).

[c] 0.20 lb NO_X/MMBtu applies when firing gaseous fuels only.

[d] 0.30 lb NO_X/MMBtu applies when firing oil or a combination of natural gas, oil, TDF or biomass (no coal).

[e] 0.45 lb NO_X/MMBtu applies when firing coal or a combination of coal, TDF, and biomass.

Pollutant	lb/hr	Origin and Authority
PM	48.8	MEDEP Chapter 140, BPT
PM_{10}	48.8	MEDEP Chapter 140, BPT
SO_2	977	MEDEP Chapter 140, BPT
NO_X	366	MEDEP Chapter 140, BPT
CO	130.2	MEDEP Chapter 140, BPT
VOC	40.7	MEDEP Chapter 140, BPT

G. International Paper shall operate boiler 8 such that visible emissions from the stack does not exceed 20% opacity on a six (6) minute block average basis, except one (1) six (6) minute block average in a 1-hour block period of not more than 27% opacity. [40 CFR Part 60.42]

H. Compliance with the opacity limit on the boiler 8 stack shall be demonstrated by a continuous opacity monitoring system (COM) and the COM shall be maintained and operated in accordance with Chapter 117 and 40 CFR Part 60, Section 60.45. [40 CFR Part 60.45 and MEDEP Chapter 117]

I. International Paper shall perform stack tests every other year, with the next test taking place in 2006, on boiler 8 to determine compliance with the PM lb/hr emission limit. The stack test shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 1-5 or other method as approved by EPA and the Department. [MEDEP Chapter 140, BPT]

J. Compliance with the NO_X lb/MMBtu emission limits for boiler 8 shall be on a 3-hr rolling average and 24-hr block average basis as listed in the table above, demonstrated by a NO_X CEMS. Startup, shutdown, equipment malfunction, and fuel switching shall not be included in determining 24-hr daily block arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. [40 CFR Part 60.45 and MEDEP Chapter 138, NO_X RACT]. International Paper shall maintain the NO_X CEMS in accordance with Chapter 117 and 40 CFR Part 60, Section 60.45. [MEDEP Chapter 117 and 40 CFR §60.45]

K. Compliance with the SO_2 lb/MMBtu emission limits for boiler 8 shall be on a 3-hr rolling average, demonstrated by an SO_2 CEMS. [40 CFR Part 60.45]. International Paper shall maintain the SO_2 CEMS in accordance with Chapter 117, and 40 CFR Part 60, Section 60.45. [MEDEP Chapter 117 and 40 CFR §60.45]

L. For no more than four (4) hours during start-up, International Paper may make the following calculation corrections for boiler 8:
   1. Stack O_2 levels that exceed 14.0% may be replaced with a value of 14.0
   2. Stack CO_2 levels less than 5.0% may be replaced with a value of 5.0
   3. Hourly lb/MMBtu averages for SO_2, NO_X, and CO may be recalculated if the observed stack O_2 is greater than 14.0% and/or the observed stack CO_2 is less than 5.0% for no more than four (4) hours during start-up.
   4. The recalculated hourly lb/MMBtu averages may be used for compliance purposes.

   [MEDEP, Chapter 140, BPT]

M. For boiler 8, exceedances of the opacity limit during the first six hours following the initiation of startup or planned shutdown shall be exempt by the Department, provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. Any person claiming an exemption shall have the burden of proving that any excess emissions were not caused entirely, or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition. [MEDEP, Chapter 140, BPT]

N. Boiler 8 is subject to and shall comply with the applicable requirements of the Federal New Source Performance Standards 40 CFR Part 60, Subpart A (General Provisions). [40 CFR Part 60, Subpart A]

O. International Paper shall establish the applicability and precedence of the various monitoring requirements of 40 CFR Part 60, Sections 60.45 and and Chapter 117 of the Departments regulations in a monitoring protocol for boiler #8 that shall be submitted for Department approval within 90 days from the issuance of this license. [MEDEP Chapter 140, BPT]

P. Boiler 8 Periodic Monitoring

1. International Paper shall maintain monthly records of the fuel use for the boiler. The fuel oil use records shall include sulfur content, demonstrated by fuel analysis (es) from the supplier for each delivery. The waste oil use records may be on a monthly mill total basis and not a per boiler basis.
2. International Paper shall keep records of the results of the analysis(es) of representative waste oil sample(s) and shall test representative samples annually or more frequently if changes occur in the process that may effect the composition of the waste oil collected. The results of the analyses shall be kept on-site.
3. International Paper shall maintain a log of the ESP secondary T/R voltage and current meter reading and record the voltage and current meter reading once per day. The periodic monitoring in this license relating to the boiler 8 ESP will be superceded by the continuous monitoring system requirements of 40 CFR Part 63, Subpart DDDDD once the CMS is approved.
4. International Paper shall maintain a log detailing all routine and non-routine maintenance on the ESP. International Paper shall keep a log documenting the date and nature of all ESP failures.
5. International Paper shall submit, for approval, a multiclone maintenance plan to the Department within 60 days of issuance of this license. International Paper shall keep a log(s) and maintain the Boiler 8 multiclones according to the submitted plan.

[MEDEP Chapter 140, BPT]

(16) **Combined Cycle Gas Turbine**

A. The gas turbine system (nominal 175 MW F class combustion turbine with advanced dry low NO_X combustors and an unfired heat recovery system) is subject to and shall comply with the applicable requirements of the Federal New Source Performance Standards 40 CFR Part 60, Subpart A (General Provisions). [40 CFR Part 60, Subpart A]

B. International Paper is licensed to fire natural gas and fuel oil in the combustion turbine. The sulfur content of the fuel oil shall not exceed 0.05% by weight. The fuel oil use shall be limited to 21,587,040 gallons/year based on a calendar basis. Records shall be kept of the monthly fuel use. Documentation in the form of fuel oil analysis per 40 CFR Part 75 or delivery receipts shall be maintained demonstrating compliance with the fuel oil sulfur content. [MEDEP Chapter 140, BPT]

C. International Paper shall operate the turbine with water or steam injection during the firing of fuel oil for NO_X emission control. [MEDEP Chapter 140, BPT]

D. Emissions from the gas turbine shall not exceed the following limits, except during startup, shutdown, fuel transfer, and turbine re-tuning periods (as defined in condition 16(M)):

Pollutant	Fuel	ppmdv	Ave time	Lb/hr
PM	Gas	--	--	9
	Oil	--	--	17
PM_{10}	Gas	--	--	9
	Oil	--	--	17
SO_2	Gas	--	--	12
	Oil	--	--	102
NO_X	Gas	9 @15% O_2	24 hr block ave	65
	Oil	42 @15% O_2	24 hr block ave	348
CO	Gas	9 @15% O_2	24 hr block ave	32
	Oil	15 @15% O_2	24 hr block ave	104
VOC	Gas	--	--	3
	Oil	--	--	8

For any hour during which fuel oil is fired in the turbine, whether gas was also fired in that hour or not, the lb/hr and ppm emission limits associated with firing fuel oil shall apply. [MEDEP Chapter 140, BPT]

E. Visible emissions from the turbine exhaust stack shall not exceed 20% opacity, based on 6 minute block averages, except for one 6 minute block average period per hour of not more than 27% opacity. Compliance shall be demonstrated in accordance with 40 CFR Part 60, Method 9 or with the operation of a COMS when applicable. [MEDEP Chapter 140, BPT]

F. Compliance with the SO_2 lb/hr emission limit shall be demonstrated by the natural gas and fuel oil firing rate into the turbine and by fuel sample analysis of the natural gas and fuel oil sulfur content as required in accordance with 40 CFR Part 60, Subpart GG, Section 60.333 or by other methods allowed by 40 CFR Part 75, Subpart B. [40 CFR Part 60, Subparts GG and 40 CFR Part 75, Subpart B]

G. Compliance with the NO_X and CO emission ppmvd emission limits shall be demonstrated by the use of CEMS. [40 CFR §75.10(a) and MEDEP Chapter 117]

H. When requested by the Bureau of Air Quality, compliance with the NO_X and CO lb/hr emission limits shall either be demonstrated through stack testing in accordance with 40 CFR Part 60, Appendix A (Method 7 for NO_X and Method 10 for CO), or other method as approved by the Department and EPA. [MEDEP Chapter 140, BPT]

I. When requested by the Bureau of Air Quality, compliance with the VOC lb/hr emission limit shall be demonstrated through stack testing in accordance with 40 CFR Part 60, Appendix A, Method 25A or other method as approved by the Department and EPA. [MEDEP Chapter 140, BPT]

J. Additional Emission Reductions
International Paper shall continue to participate in a cooperative stakeholder process with the DEP to develop an alternative project or projects that will result in overall emission and environmental impact reductions equal to or greater than what would have been attained by adding SCR on the gas turbine. International Paper has committed three million dollars ($3,000,000) to fund a project or projects at the Bucksport mill that will reduce its environmental footprint. The project or projects are in the process of being determined by a stakeholder group, based on the capability of the project(s) to help meet agreed upon environmental goals, provide added value to the mill, assist the mill in meeting other environmental commitments, and decrease the risk of environmental incidents at the mill. The stakeholder process has started with all projects expected to be completed by June 30, 2006. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

K. International Paper shall establish the applicability and precedence of the various monitoring requirements of 40 CFR Part 60, Subpart GG, 40 CFR Part 75, and Chapter 117 of the Departments regulations in a monitoring protocol for the gas turbine that shall be submitted for Department approval within 90 days from the issuance of this license. [MEDEP Chapter 140, BPT]

L. Gas Turbine Periodic Monitoring

1. International Paper shall maintain records of the hours of operation of the gas turbine, including startup, shutdown, and any other downtime. [MEDEP Chapter 140, BPT]

2. International Paper shall monitor and record the following, as specified, for the gas turbine system:

	Monitor	**Record Monitoring Data**	**Origin and Authority**
Turbine natural gas firing rate	Continuously	Continuously	40 CFR §75.11e
Turbine fuel oil firing rate	Continuously	Continuously	40 CFR §75.11e

Continuous is defined as no less than 2 points in any one-hour period.

3. Fuel flow shall be monitored by use of a fuel flow meter operated in accordance with 40 CFR Part 75 Appendix D. [40 CFR §75.10(a)(1) and Appendix D]

4. International Paper shall monitor the sulfur content of the natural gas and the sulfur content of the fuel oil as described in 40 CFR Part 60, Subpart GG, as allowed in 40 CFR Part 75 Subpart B, or by a frequency as approved by the Department and EPA. [40 CFR Part 60, Subpart GG]

M. Turbine Startup/Shutdown, Fuel Transfer, and Re-Tuning

International Paper shall minimize emissions from the gas turbine to the maximum extent practicable during startup and shutdown, during fuel transfer, and under maintenance or adjustment conditions, by following proper operating procedures to minimize the emissions of air contaminants to the maximum extent practical. Gas turbine startup and shutdown and fuel transfer limits for NO_X and CO shall not exceed the following:

Pollutant	**Fuel**	**ppmdv**
NO_X	Gas or liquid fuel	200 @15% O_2
CO	Gas or liquid fuel	2250 @15% O_2

Turbine startup shall be defined as that period of time from initiation of combustion turbine firing until the unit reaches steady state load operation. When firing gas, steady state operation shall be reached when the combustion turbine reaches "6Q" defined as when the turbine reaches its ninth operational mode with all six gas nozzles and the Q burners firing. When firing liquid fuel, steady state operation shall be reached when the combustion turbine water injection rate reaches steady sustainable load (defined as 20 gpm).

This period shall not exceed 90 minutes for a hot start, 180 minutes for a warm start, or 240 minutes for a cold start. A hot start shall be defined as startup when the generating unit has been down for 2 hours or less. A warm start shall be defined as startup when the generating unit has been down for more than 2 hours and less than or equal to 48 hours. A cold start shall be defined as startup when the generating unit has been down for more than 48 hours.

Shutdown shall be defined as that period of time from steady state operation to cessation of combustion turbine firing, or when the turbine goes into a fired shutdown. This period shall not exceed 60 minutes.

A *fuel transfer* mode shall be defined as the period of time during which the fuel fired in the turbine is switched from fuel oil to gas or gas to fuel oil. This period shall not exceed 120 minutes.

Turbine re-tuning shall be defined as that period of time from initiation of combustion turbine firing until two hours after the computer has signaled the turbine reaching base load. This period shall not exceed 48 hours for each fuel

[MEDEP Chapter 140, BPT]

N. Acid Rain Requirements

1. International Paper shall comply with the applicable Federal Acid Rain Program requirements codified in 40 CFR Parts 72, 73, 75, and 78. [40 CFR Parts 72, 73, 75, and 78]

2. International Paper shall obtain and hold in the EPA allowance Management System, sufficient Acid Rain allowances for each ton of SO2 emitted annually in accordance with the requirements of 40 CFR Parts 72, 73, 75, and 78. [40 CFR Parts 72, 73, 75, and 78]

(17) **Annual Emission Limits and Compliance Demonstration**

A. The combined emissions from boilers 5, 6, 7, and 8 and the gas turbine shall not exceed the following annual emissions on a 12 month rolling total basis (these numbers were established in order to net the gas turbine out of the PSD program when the gas turbine was installed):

Pollutant	**Tons/year**
PM	351
PM_{10}	341
SO_2	2800
NO_X	1410
CO	628
VOC	205

[MEDEP, Chapter 140]

B. In order to demonstrate compliance with the annual emission limitations in tons per year, on a 12 month rolling total basis from boilers 5, 6, 7, and 8 and the gas turbine, International Paper shall maintain the following records and calculations:

1. Fuel Use Records

(a) For Boilers 5, 6, and 7, monthly fuel use records shall be maintained, including gallons of fuel oil and specification and off-specification waste oil.
(b) For boiler 8, monthly fuel use records shall be maintained including gallons of fuel oil, specification and off-specification waste oil, tons of coal, scf of natural gas, tons of biomass, tons of sludge, and tons of tire chips utilized.
(c) For the turbine, monthly fuel use records for natural gas and fuel oil shall be maintained. Also, the number of hours the turbine fires on gas and fuel oil shall be recorded.
(d) The fuel oil records shall indicate the percent (%) sulfur content of the fuel by weight (demonstrated by the purchase receipts and/or fuel analysis from the supplier).

[MEDEP Chapter 140]

2. Calculation Records

International Paper shall calculate PM, PM_{10}, SO_2, NO_X, CO, and VOC tons on monthly and 12 month rolling total basis in accordance with the following:

(a) The following heat content values shall be used:

Type of Fuel	Heat Content	Moisture Basis
Fuel Oil	0.15 MMBtu/gal *	n/a
Coal	13,000 Btu/lb	n/a
Biomass	9 MMBtu/ton, as fired	50%
Tire Chips	31 MMBtu/ton	n/a
Natural Gas	1,000 Btu/scf	n/a

* Heat content of #6 fuel oil is listed. This number can be adjusted for other types of fuel oil (i.e. - #2 fuel oil is 0.14 MMBtu/hr).

Note: Sludge values will be determined and agreed upon by the Department and International Paper.

(b) Monthly heat input values (MMBtu/month) shall be calculated by multiplying the monthly fuel consumption values for each boiler by the heat content of the fuel given in the above table. For boiler 8, total heat input shall be determined by summing the individual heat input of each fuel burned in the boiler during the month.

(c) PM and PM_{10} tons/year Emission Calculations
For boilers 5, 6, 7, and 8, International Paper shall calculate PM and PM_{10} emissions by multiplying the licensed lb/MMBtu emission limit for each boiler by the monthly heat input (MMBtu/month) supplied to each boiler.

For the turbine, International Paper shall calculate PM and PM_{10} emissions by multiplying the licensed lb/hr emission limits for gas and oil by the number of hours that the turbine fires each fuel in a given month.

(d) SO_2 tons/year Emission Calculations
For boilers 5, 6, and 7 International Paper shall calculate the SO_2 emissions by using a mass balance to calculate lb SO_2/MMBtu and then multiplying the lb SO_2/MMBtu by the monthly heat input (MMBtu/month) supplied to each boiler. The mass balance, using the

SO_2 to sulfur ratio, the density of #6 fuel, and the heat content of the fuel, is as follows:
(x% sulfur/100 lb fuel)(64 lb SO_2/32 lb S)(7.88 lb fuel/gal)(gal/0.15 MMBtu) = lb SO_2/MMBtu
Note: The density of the fuel and the heat content may be adjusted if #6 fuel oil is not being used (i.e. – density of #2 fuel oil is 7.05 lb fuel/gal)

For boiler 8, International Paper shall calculate SO_2 emissions by using CEMS data that provides a daily average emission rate expressed in lb/MMBtu. Daily average emission rates shall be used to calculate a monthly average emission rate. The monthly average emission rate shall be multiplied by the total monthly heat input, MMBtu/month, in boiler 8 to obtain monthly emissions.

For the turbine, International Paper shall calculate SO_2 emissions by methods allowed under 40 CFR Part 75, Subpart B. [MEDEP, Chapter 140 and 40 CFR Part 75].

(e) NO_X tons/year Emission Calculations
For boilers 5, 6, and 7, International Paper shall calculate NO_X emissions by multiplying the following lb/MMBtu emission limit for each boiler by the monthly heat input (MMBtu/month) supplied to each boiler:

Boiler #5	0.36 lb/MMBtu
Boiler #6	0.27 lb/MMBtu
Boiler #7	0.27 lb/MMBtu

For boiler 8, International Paper shall calculate NO_X emissions by using CEMS data that provides a daily average emission rate expressed in lb/MMBtu. Daily average emission rates shall be used to calculate a monthly average emission rate. The monthly average emission rate shall be multiplied by the total monthly heat input, MMBtu/month, in boiler 8 to obtain monthly emissions.

For the turbine, International Paper shall calculate NO_X emissions by using CEMS data to determine NO_X ppm emissions from the turbine on an hourly basis. Daily lb/MMBtu emission rates will be calculated from the CEM data by use of a fuel factor (F factor). These daily average emission rates shall be used to calculate a monthly average emission rate. The monthly average emission rate shall be multiplied by the total monthly heat input, MMBtu/month, to the turbine to obtain the actual monthly NO_X mass emissions.

(f) CO tons/year Emission Calculations
For boilers 5, 6, 7, and 8, International Paper shall calculate CO emissions by multiplying the licensed lb/MMBtu emission limit for each boiler by the monthly heat input (MMBtu/month) supplied to each boiler.

For the turbine, International Paper shall calculate CO emissions by using CEMS data to determine CO ppm emissions from the turbine on an hourly basis. Daily lb/MMBtu emission rates will be calculated from the CEM data by use of a fuel factor (F factor). These daily average emission rates shall be used to calculate a monthly average emission rate. The monthly average emission rate shall be multiplied by the total monthly heat input, MMBtu/month, to the turbine to obtain the actual monthly CO mass emissions.

(g) VOC tons/year Emission Calculations
For boilers 5, 6, 7, and 8, International Paper shall calculate VOC emissions by multiplying the licensed lb/MMBtu emission limit for each boiler by the monthly heat input (MMBtu/month) supplied to each boiler.

For the turbine, International Paper shall calculate VOC emissions by multiplying the licensed lb/hr emission limits for gas and oil by the number of hours that the turbine fires each fuel in a given month.

(h) Missing data estimation procedures found in 40 CFR Part 75, Appendix C may be used for missing data periods with respect to NO_X and SO_2 emissions. Any other missing data estimation procedures approved by the Department may also be used.

[MEDEP Chapter 140]

(18) **SICE Engines**

A. International Paper may operate a number of SICEs less than 3 MMBtu/hr, which are considered insignificant activities if the units fire propane, natural gas, or diesel fuel with a sulfur content not to exceed 0.05%. International Paper shall keep records of the sulfur content of diesel fuel fired in these units to demonstrate compliance with the insignificant activity threshold, otherwise International Paper shall amend the license to specifically include those units not meeting the fuel requirement. [MEDEP Chapter 140, Appendix B]

B. International Paper may operate temporary SICEs greater than 3 MMBtu/hr on site for 500 hours or less duration, per unit. Records shall be kept documenting the fuel sulfur content (not to exceed 0.05%) and the hours of

operation for any temporary units greater than 3 MMBtu/hr. [MEDEP Chapter 140, BPT]

C. Temporary non-road mobile engines with a capacity of 3 MMBtu/hr or less may be brought on site for limited use during maintenance, construction activities and/or during emergencies and are considered insignificant activities. The non-road mobile engines shall only be deemed temporary if the units are on site less than 12 consecutive months. International Paper shall produce documents demonstrating that no units are on site for more than 12 months, if requested by the Department. [MEDEP Chapter 140, Appendix B]

D. International Paper is licensed to fire diesel fuel with a maximum fuel sulfur content of 0.05% sulfur in the emergency diesel generators Onan 1, 2 and 3. Records shall be kept documenting the fuel sulfur content. [BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT]

E. International Paper is limited to operating each of the three Onan emergency diesel generators 500 hours per year on a 12 month rolling total basis. [BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT]

F. Emissions from Emergency Diesel Generators Onan 1 and 2 (6.26 MMBtu/hr each) shall each not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority
PM	0.12	MEDEP Chapter 103

Pollutant	lb/hr	Origin and Authority
PM	0.36	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
PM_{10}	0.36	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
SO_2	0.32	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
NO_X	26.45	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
CO	2.23	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
VOC	0.84	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT

G. Emissions from Emergency Diesel Generator Onan 3 (4.92 MMBtu/hr) shall not exceed the following:

Pollutant	Lb/MMBtu	Origin and Authority
PM	0.12	MEDEP Chapter 103

Pollutant	Lb/hr	Origin and Authority
PM	0.2	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
PM_{10}	0.2	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
SO_2	0.25	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
NO_X	16.44	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
CO	2.12	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT
VOC	0.33	BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT

H. Visible emissions from each of the three Onan emergency generators shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 101]

I. Onan Emergency Diesel Generators' Periodic Monitoring
   1. International Paper shall maintain monthly and 12 month rolling total operating records for each of the three Onan Emergency diesel generators.
   2. International Paper shall maintain sulfur fuel content records for the diesel fuel fired in the three Onan Emergency diesel generators

   [BACT, license A-22-71-Y-A, Aug. 2002 and MEDEP Chapter 140, BPT]

(19) **Coal Processing Equipment (when in operation)**

A. International Paper shall operate and maintain baghouses for particulate matter control on the following (multiple exhaust points may be controlled by one baghouse and some exhaust points have individual baghouses):
   1. Coal unloading area
   2. Coal conveying
   3. Three coal conveyor transfer points
   4. Coal crushing
   5. Coal screening
   6. Coal storage silos 1 and 2
   7. Stoker Coal Bunker
   8. Pulverized coal bunkers A, B, and C

   [MEDEP Chapter 140, BPT]

B. Visible emissions from each baghouse used to control the sources listed above shall not exceed 10% on a six (6) minute block average basis, for more than one (1) six minute block average in a 1 hour period. International Paper shall take corrective action if visible emissions from the baghouses exceed 5% opacity, on a six (6) minute block average basis.
[MEDEP Chapter 101]

C. In no case shall visible emissions from the coal processing, conveying, and storage equipment exceed 20% opacity. Baghouse emissions are limited by condition 19(B) above. [40 CFR Part 60, Subpart Y]

D. Coal Processing Periodic Monitoring

International Paper shall maintain a log detailing all routine and non-routine maintenance on each baghouse. The log shall include the location, date, and nature of all bag failures. [MEDEP Chapter 140, BPT]

(20) **Clay and Starch Process Equipment**

A. International Paper shall operate and maintain baghouses for particulate matter control on the following:
1. Clay unloading system
2. Starch silos 1 and 2
3. Starch weigh hoppers 1 and 2
[MEDEP Chapter 140, BPT]

B. Visible emissions from each baghouse used to control the sources listed above shall not exceed 10% on a six (6) minute block average basis, except for no more than one (1) six minute block average in a 1 hour period. International Paper shall take corrective action if visible emissions from the baghouses exceed 5% opacity, on a six (6) minute block average basis. [MEDEP Chapter 101]

C. Clay and Starch Process Periodic Monitoring

International Paper shall maintain a log detailing all routine and non-routine maintenance on each baghouse. The log shall include the location, date, and nature of all bag failures. [MEDEP Chapter 140, BPT]

(21) **Roll Grinding Operations**

A. International Paper shall operate and maintain two wet scrubbers and a baghouse for particulate matter control on the three roll grinding operation

exhaust points. When steel rolls are placed on the grinders, the wet scrubbers are not required to be operated, unless deemed necessary. [MEDEP, Chapter 140, BPT]

B. Visible emissions from the baghouse for the roll grinding operations (cloth fill rolls) shall not exceed 10% opacity on a six (6) minute block average basis, except for no more than one (1) six minute block average in a 1 hour period. International Paper shall take corrective action if visible emissions from the baghouses exceed 5% opacity, on a six (6) minute block average basis. [MEDEP Chapter 101]

C. Visible emissions from each wet scrubber for the roll grinding operations (rubber rolls) shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than one (1) six minute block average in a 1 hour period. [MEDEP Chapter 101]

D. Roll Grinding Operations Periodic Monitoring

International Paper shall maintain a log detailing all routine and non-routine maintenance on each wet scrubber and baghouse. The log shall include the date and nature of all wet scrubber or baghouse failures. [MEDEP Chapter 140, BPT]

(22) **Paper Machine Equipment and Off Machine Coater**

A. International Paper shall meet the applicable record keeping and recording requirements set forth in Chapter 123 of the Department's regulations for the paper coaters. [MEDEP, Chapter 123]

B. The Off Machine Coater (total of 48 MMBtu/hr) shall fire only propane or natural gas.
[MEDEP Chapter 138, NO_X RACT]

C. NO_X emissions from the Off Machine Coater burners shall not exceed 0.14 lb/MMBtu. [MEDEP Chapter 138, NO_X RACT]

D. Visible emissions from the four Off Machine Coater roof vents shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than one 6 minute block average in a 1 hour period. [MEDEP Chapter 101]

E. Off Machine Coater Periodic Monitoring

International Paper shall maintain monthly fuel use records and hours of operation for the Off Machine Coater. [MEDEP Chapter 140, BPT]

(23) **Thermomechanical Pulping Process**

Visible emissions from each of the cyclones used to convey and separate wood product shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than one 6 minute block average in a 1 hour period. [MEDEP Chapter 101]

(24) **Solvent Degreasers**

International Paper shall keep MSDS sheets for the solvents used at the facility on file. For any solvents that are not exempt from Chapter 130 of the Department's regulations, International Paper shall comply with the applicable requirements of Chapter 130.
[MEDEP Chapter 140, BPT and MEDEP Chapter 130]

(25) **Wastewater Treatment Plant**

International Paper shall control air emissions from the wastewater treatment plant through the operation of a waste water treatment system as required by effluent discharge license restrictions issued pursuant to the facility's National Pollution Discharge Elimination System (NPDES) discharge permit (or State equivalent). [MEDEP Chapter 134, VOC RACT]

(26) **Fugitive Emissions**

Potential sources of fugitive PM emissions, including material stockpiles, and paved and unpaved roadways shall be controlled when appropriate by wetting with water, calcium chloride, or other methods or by sweeping paved roadways as approved by the Bureau of Air Quality. Visible emissions from a fugitive emission source shall not exceed an opacity of 20% except for no more than five (5) minutes in any 1 hour period. Compliance shall be determined by an aggregate of the individual 15 second opacity observations which exceed 20% in 1 hour. [MEDEP, Chapter 101]

(27) **Gasoline Storage Tanks**

A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank. [MEDEP Chapter 118]

B. International Paper shall maintain records of the monthly and annual throughput of gasoline. [MEDEP Chapter 118]

(28) **CEMS and COMS**

A. All CEMS and COMS required by this license shall meet the sampling and performance criteria specified in 40 CFR Part 51 Appendix P, and shall be operated in accordance with the applicable requirements of 40 CFR Part 60 Appendix F, 40 CFR Part 75, Appendix B, and Chapter 117 of the Departments regulations, including.
   1. Conducting Relative Accuracy Testing (RATA) and/or Performance Audits in accordance with 40 CFR Part 75, Appendix B or Chapter 117 of the Department's regulations, and
   2. Developing and maintaining an updated quality assurance plan for all CEMS and COMS in accordance with 40 CFR Part 60 Appendix F, 40 CFR Part 75, Appendix B, and Chapter 117 of the Department's regulations, as applicable.

   [MEDEP Chapter 117 and 40 CFR Part 75]

B. For all of the continuous emission monitors (CEMS) and continuous opacity monitors (COMS) required by this license, the licensee shall maintain records of the most current six-year period and the records shall include:
   1. Documentation which shows monitor operational status during all source operating time, including specifics for calibration and audits; [MEDEP Chapter 117]
   2. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, 40 CFR Part 75, Appendix B, and 40 CFR Part 60, Appendices B and F, as applicable; [MEDEP Chapter 117 and 40 CFR Part 75]
   3. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P. [MEDEP Chapter 117]

(29) **Periodic Monitor Requirements**

International Paper shall keep documentation for a complete data set of all periodic monitors specified in this license for a six year period in a manner that is readily available, legible, and chronological by quarter. All periodic records shall be made available to the Bureau of Air Quality upon request. [MEDEP Chapter 140, BPT]

(30) **Quarterly Reports**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following for the control equipment, Continuous Emission Monitoring Systems (CEMS) and/or Continuous Opacity Monitoring Systems (COMS) required by this license: [MEDEP Chapter 117]

1. All control equipment downtimes and malfunctions;
2. All CEMS or COMS downtimes and malfunctions;
3. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
   (a) Standard exceeded;
   (b) Date, time, and duration of excess event;
   (c) Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
   (d) A description of what caused the excess event;
   (e) The strategy employed to minimize the excess event; and
   (f) The strategy employed to prevent reoccurrence.
4. A report certifying there were no excess emissions, if that is the case.

(31) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 30th and January 30th of each year with the initial semiannual report due July 30, 2005. The semiannual report shall be considered on time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
   [MEDEP Chapter 140]

(32) **Annual Compliance Certification**

International Paper shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 30 of each year, with the initial annual certification due January 30, 2006. The annual compliance

certification shall be considered on time if the postmark of the submittal is before the due date or if the report is received by the Department within seven calendar days of the due date.

Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(33) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, International Paper shall annually report to the Department as specified by Chapter 137, the information necessary to accurately update the State's emission inventory by means of:

A. A computer program and accompanying instructions supplied by the Department; or
B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

(34) **Air Toxics Emissions Statement**

As specified in MEDEP Chapter 137, International Paper shall report the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

[MEDEP, Chapter 137]

(35) **General State Requirements**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, sub-§5	Mercury Emission Limit	Enforceable by State-only

(36) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, International Paper shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B.
[40 CFR, Part 82, Subpart F]

(37) **Asbestos Abatement**

When undertaking Asbestos abatement activities, International Paper shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M. [40 CFR Part 61, Subpart M]

(38) **POWC (Paper and Other Web Coating) MACT**

International Paper is subject to the applicable requirements of 40 CFR Part 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, which became effective December 4, 2002. The paper coating process, subject to the POWC MACT standard, includes the off-machine coater and the coating chemical preparation area. [40 CFR Part 63.3300(a)]. International Paper shall comply with the following:

A. For the existing applicable emission units, International Paper shall achieve compliance with the emission standards for existing paper coating lines in 40 CFR Part 63.3320 for each and every month beginning no later than December 5, 2005, using the procedures set forth in 40 CFR Part 63.3370.

B. Beginning on the compliance date of December 5, 2005, International Paper shall meet the applicable recordkeeping and reporting requirements of 40 CFR Part 63, Subpart JJJJ.

[40 CFR Part 63, Subpart JJJJ]

(39) **Additional MACTS**

A International Paper is subject to 40 CFR Part 63, Subpart YYYY for the Stationary Combustion Turbine NESHAP and shall comply with all applicable requirements (however, as currently operated, no standards apply). [40 CFR Part 63, Subpart YYYY]

B. International Paper is subject to the applicable control options, monitoring, notifications, and record keeping, listed in 40 CFR Part 63, Subpart DDDDD for the Industrial/Commercial/Institutional Boilers and Process Heaters NESHAP and shall meet the compliance schedule set forth in the NESHAP. [40 CFR Part 63, Subpart DDDDD]

C. International Paper is subject to 40 CFR Part 63, Subpart ZZZZ for the Stationary Reciprocating Internal Combustion Engine NESHAP and shall comply with all applicable requirements (however, as currently operated, no additional standards apply). [40 CFR Part 63, Subpart ZZZZ]

(40) **Certification by a Responsible Official**

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official, unless there is a provision in a regulation to allow electronic submittals (ie- 40 CFR, Part 75, quarterly). [MEDEP Chapter 140]

(41) **Annual License Fee**

International Paper shall pay the annual air emission license fee within 30 days of October 31 of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3. [MEDEP Chapter 140]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 27, 1998
Date of application acceptance: March 9, 1998

Date filed with the Board of Environmental Protection _____

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.